UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE:

APPLICATION OF ATVOS AGROINDUSTRIAL INVESTMENTOS S.A. UNDER 28 U.S.C. § 1782 TO TAKE DISCOVERY FROM BANCO BILBAO VIZCAYA ARGENTARIA, S.A., INTESA SANPAOLO S.P.A., NEW YORK BRANCH, LONE STAR GLOBAL ACQUISITIONS, LTD, LONE STAR GLOBAL ACQUISITIONS, LLC, LONE STAR NORTH AMERICA ACQUISITIONS. L.P., LONE STAR GLOBAL ACQUISITIONS (NY), LLC, LONE STAR NORTH AMERICA ACQUISITIONS, LLC, LSF10 BRAZIL U.S. HOLDINGS, LLC, MUFG BANK, LTD., NATIXIS S.A., NEW YORK BRANCH, AND SUMITOMO MITSUI BANKING CORPORATION

Case No. 1:20-mc-00211-GBD

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JOINT STATUS REPORT

Pursuant to the Opinion and Order of the Honorable Magistrate Judge Stewart D. Aaron entered on August 24, 2020 (Dkt. No. 83), Atvos Agroindustrial Investimentos S.A. ("Petitioner"), and Banco Bilbao Vizcaya Argentaria, S.A., Intesa Sanpaolo S.p.A., New York Branch, MUFG Bank, Ltd., Sumitomo Mitsui Banking Corporation, and Natixis S.A., New York Branch ("Natixis") (collectively, "Respondents"), hereby jointly provide this Court with an update regarding the parties' efforts to agree on the scope of production.

The parties have substantially resolved most of the disputes concerning the scope of the subpoenas, but seek a short extension to confer with their clients as to the few remaining issues under discussion. The parties respectfully jointly request until Wednesday, September 16, 2020, to submit any remaining disputes to the court, as necessary.

Respectfully submitted,

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Request GRANTED. SO ORDERED.

Dated: 9/12/2020

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